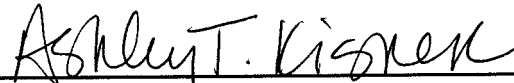


U.S. DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
FILED  
JUL 16 2001  
CLERK, U.S. DISTRICT COURT  
By \_\_\_\_\_ Deputy

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## GENERAL MOTORS' TRIAL EXHIBIT LIST

Respectfully submitted,



**KIRK F. SNIFF**

State Bar No. 18797800

**KAREN BROWN WILL CUTTS**

State Bar No. 03149750

**ASHLEY T. KISNER**

State Bar No. 00791783

**STRASBURGER & PRICE, L.L.P.**

901 Main Street, Suite 4300

Dallas, Texas 75202

(214) 651-4300

(214) 651-4330 (Facsimile)

**ATTORNEYS FOR PLAINTIFF**

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing document has been sent via facsimile and Federal Express, to counsel for Defendants, Tracy Crawford, Ramey & Flock, P.C., 500 First Place, Tyler, Texas 75702, on this 16 day of July, 2001.



**ASHLEY T. KISNER**

**PLAINTIFF GENERAL MOTORS CORPORATION'S  
TRIAL EXHIBIT LIST**

<b>Exhibit Number</b>	<b>Description</b>	<b>"Expect" to offer</b>	<b>"May" offer if need arises</b>
1.	GM Corporation Corporate Purchase Agreement with all attachments and exhibits.	✓	
2.	9/29/95 letter to Camilleri from S. Mobley re: facility name change.	✓	
3.	Correspondence to Mobley Environmental and American Ecology Corp. From Kirk Sniff dated May 3, 1999	✓	
4.	Correspondence to Zurich and Willis Coroon from Art Noel dated June 11, 1999.	✓	
5.	Correspondence to Zurich and Willis Coroon from Art Noel dated June 18, 1999.	✓	
6.	Correspondence to Rosemary Sage Jones from Art Noel dated June 30, 1999.	✓	
7.	Correspondence to Zurich and Willis Coroon from Art Noel dated July 2, 1999.	✓	
8.	Correspondence to Art Noel from Rosemary Jones Sage dated June 29, 1999 re: denial of GM request for indemnity.	✓	
9.	Correspondence to Rosemary Sage Jones from Kirk Sniff dated July 12, 1999 responding to June 29 letter.	✓	
10.	Rule 11 letter dated 7/27/99 from Sniff to Hilliard re settlement in <i>Adams</i> . Letter signed on 7/28/99.	✓	
11.	Plaintiffs' Third Amended Petition in <i>Adams</i>	✓	
12.	Complaint in <i>Zurich</i> litigation.	✓	
13.	Order re prove-up of guardian ad litem's attorney's fees allocated to GM	✓	
* 14.	Amended Final Judgment in <i>Virgie Adams, et al v. Acadia Elastomers Corp., et al</i> , District Court, 236 <sup>th</sup> District Court, Tarrant County, Texas signed by Judge on 2/10/00.		✓
15.	GM's Original Complaint in <i>GM v. AEC, et al</i> .		✓
16.	AEESC's Answer in <i>GM v. AEC, et al</i> .		✓
17.	April 21, 2000 Settlement Demand from Karen Willcutts for GM to Rosemary S. Jones for AEC.		✓
18.	AEC's Responses to First Set of Request for Admissions		✓
19.	AEESC's Response to Second Set of Requests for Admissions		✓

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TRIAL EXHIBIT LIST**

<b>Exhibit Number</b>	<b>Description</b>	<b>"Expect" to offer</b>	<b>"May" offer if need arises</b>
20.	AEESC's Objections and Responses to First Set of Requests for Admissions		√
21.	AEC's Objections and Responses to Second Set of Interrogatories	√	
22.	Stock Purchase Agreement Dated as of May 10, 1994 By and Between American Ecology Corporation and Mobley Environmental Services, Inc.		√
23.	Amended Stock Purchase Agreement Dated as of September 2, 1994 By and Between American Ecology Corporation and Mobley Environmental Services, Inc.		√
24.	CV of Davis Ford, P.E.	√	
25.	List of documents provided to Davis Ford on 06/22/00.		√
26.	Report of Expert Testimony of Davis Ford dated 06/22/00.	√	
27.	August 23, 2000 Davis Ford Expert Report with attachments.	√	
28.	10/6/00 Davis Ford Rebuttal Report in response to Wilson and Messenger reports.	√	
29.	Rowland Fosters' Resume	√	
30.	Rowland Fosters' Terms of Engagement		√
31.	Documents reviewed by Rowland Foster		√
32.	Rowland Foster's billing statement and description of services rendered w/ letter transmitting same to S&P.		√
33.	Transmittal letters between S&P and Rowland Foster in <i>GM v. AEC, et al.</i>		√
34.	Rowland Foster's 06/23/00 Expert Report.	√	
35.	Rowland Foster's 10/06/00 Expert Report.	√	
36.	Strasburger & Price Bills/Invoices from the <i>Adams</i> litigation.	√	
37.	Redacted S&P Bills generated in <i>GM v. AEC/Gibraltar</i> matter.	√	
38.	Strasburger & Price Bill and Payment Ledger effective from 1/1/00 thru 4/13/00 for the <i>Adams</i> litigation.	√	
39.	Strasburger & Price Bill and Payment Ledger effective from 1/1/80 thru 4/13/00 for <i>GM v. AEC, et al.</i>	√	

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TRIAL EXHIBIT LIST**

<b>Exhibit Number</b>	<b>Description</b>	<b>"Expect" to offer</b>	<b>"May" offer if need arises</b>
40.	Zurich International Time Recap Summary by Timekeeper and Cost Recap Summary by Cost Code		√
* 41.	Final Judgment in <i>Virgie Adams, et al v. Acadia Elastomers Corp., et al</i> , District Court, 236 <sup>th</sup> District Court, Tarrant County, Texas signed by Judge on 01/10/00.		√
42.	8/10/89 Amended Certificate of Insurance covering 12/1/88 through 12/1/89 (Natl. Fire Union)		√
43.	12/1/89 Certificate of Insurance covering 12/1/89 through 12/1/90 (Natl. Fire Union)		√
44.	12/1/89 Umbrella Liability Policy Declarations, Schedule of Underlying Insurance, and Endorsements covering 12/1/89-12/1/90 (Guaranty Natl Ins. Co w/ Natl Union as underlying insurer).		√
45.	12/13/89 Binder for Mobley Company's Umbrella/Excess Liability Policy covering 12/1/89 through 12/1/90 (Guaranty Natl Ins Co)		√
46.	12/18/89 Umbrella Liability Policy Declarations covering 12/1/89 through 12/1/90 (Guaranty Natl Ins Co).		√
47.	12/1/90 Common Policy and Commercial General Liability Declarations, schedules, and endorsements covering 12/1/90 through 12/1/91 (Natl Union Fire).		√
48.	1/30/90 Excess Umbrella Liability Policy w/ Schedule, Exclusions and Binder for Mobley covering 12/1/89 through 12/1/90 (Stonewall Surplus Lines Ins. Co).		√
49.	2/28/91 Policy Summary for Umbrella Liability covering 12/1/90 through 12/1/91 (Landmark American)		√
50.	2/28/91 Policy Summary for Umbrella Liability with attached declarations, endorsements and coverage form covering 12/1/90 through 12/1/91 (Landmark American)		√
51.	2/28/91 Umbrella Liability Policy Summary, Policy with exclusions and endorsements covering 12/1/90 through 12/1/91 (Stonewall Surplus)		√
52.	3/18/91 Umbrella Policy Declarations w/ Endorsements and Exclusions covering 12/1/90 through 12/1/91 (Guaranty Natl)		√
53.	3/18/91 Correspondence w/ attached policy summary for Umbrella Liability with exclusions, schedules, amendments, etc. attached covering 12/1/90 through 12/1/91 (Stonewall Surplus)		√

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TRIAL EXHIBIT LIST**

<b>Exhibit Number</b>	<b>Description</b>	<b>"Expect" to offer</b>	<b>"May" offer if need arises</b>
54.	12/1/91 Pollution Legal Liability Policy w/ declarations and endorsements covering 12/1/91 through 12/1/92 (Natl Union Fire)		✓
55.	12/2/91 Certificate of Insurance covering 12/1/91 through 12/1/92 (Natl Union Fire)		✓
56.	01/2/92 Policy Summary and Pollution Legal Liability Policy with 12 endorsements covering 12/1/91 through 12/1/92 (Natl Union Fire)		✓
57.	1/10/92 Policy Summary for Umbrella Liability covering 12/1/91 through 12/1/92 (Natl Union Fire)		✓
58.	1/10/92 Umbrella liability policy summary, declarations, endorsements, and schedules covering 12/1/91 through 12/1/92 (Natl Union Fire)		✓
59.	11/30/92 Certificate of Insurance covering 12/1/92 through 12/1/93.		✓
60.	12/1/93 Certificate of Insurance covering 12/1/93 through 12/1/94.		✓
61.	8/18/93 Policy Summary and Pollution Legal Liability Policy with 18 endorsements covering 12/1/92 through 12/1/93.		✓
62.	8/18/93 Policy Summary for Umbrella Liability covering 12/1/92 through 12/1/93 (Natl Union Fire)		✓
63.	8/18/93 Policy Summary and Commercial Umbrella Declarations with 13 endorsements and Commercial Umbrella Policy Form covering 12/1/92 through 12/1/93 (Natl Union Fire).		✓
64.	12/1/93 Policy Summary for Commercial General Liability Coverage with declarations, endorsements, exclusions, etc. covering 12/1/93 through 12/1/94.		✓
65.	12/2/93 Certificate of Insurance covering 12/1/93 through 12/1/94.		✓
66.	3/94 Policy Summary and Pollution Legal Liability Policy with 23 endorsements covering 12/2/93 through 12/1/94.		✓
67.	6/8/94 Environmental Impairment Liability Policy with endorsements covering 3/31/94 through 3/31/95.		✓
68.	12/1/94 Certificate of Insurance covering 12/1/94 through 12/1/95.		✓
69.	4/20/95 Certificate of Insurance covering 12/12/94 through 12/12/95 (Illinois Natl)		✓
70.	12/12/94 Insurance Endorsement.		✓

**PLAINTIFF GENERAL MOTORS CORPORATION'S  
TRIAL EXHIBIT LIST**

<b>Exhibit Number</b>	<b>Description</b>	<b>"Expect" to offer</b>	<b>"May" offer if need arises</b>
71.	6/1/95 Environmental Impairment Liability Policy with endorsements covering 3/31/95 through 3/31/96 (Zurich).		√
72.	9/11/95 Certificate of Insurance covering 3/31/95 through 3/31/96 (Zurich).		√
73.	9/11/95 Certificate of Insurance with endorsements covering 3/31/95 through 3/31/96 (Zurich).		√
74.	5/6/96 Environmental Impairment Liability Policy with endorsements and Binder Memorandum and Addendum covering 3/31/96 through 3/31/97 (Zurich).	√	
75.	3/25/93 TACB Violation Form and Notice of Violation	√	
76.	TACB 9/16/92 Notice of Violation		√
77.	Multiple TACB Violation Forms		√
78.	Letter from William Sanjour, U.S. EPA to Carol Browner, Administrator, U.S. EPA re: EPA bending over backwards to allow the facility with a terrible record of violations to continue its operations.		√
79.	Accident Emissions and Community Relations Efforts dated 3/18/93		√
80.	Compliance - Violations/Orders/Agreed Judgments chart listing violations in chronological order from 3/84 - 2/96.		√
81.	Chart of Compliance History from 3/84 - 1/98.		√
82.	Request for Legal Action from TACB to Attorney General - Air Compliance Summary		√
83.	Chronology of Events (chart with all NOV, spill notifications, investigations, etc.) for 6/80 - 3/96.		√
84.	Letter 12/28/89 and attachments from David to Mobley re complaint, compliance order and notice of opportunity for hearing		√
85.	TNRCC Compliance Summary dated 7/31/95		√
86.	TNRCC Compliance History dated 9/95		√
87.	Agreed Final Order dated 7/20/93 listing changes in Gibraltar Waste Analysis Plan		√
88.	Computer generated List of Violations dated 2/6/96		√

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<b>Exhibit Number</b>	<b>Description</b>	<b>"Expect" to offer</b>	<b>"May" offer if need arises</b>
89.	List of Alleged Violations found at facility during inspection by TNRCC on 4/6/94.		✓
90.	Investigation Summary by TNRCC on various days in July 1994.		✓
91.	Investigation Summary by TNRCC during 12/94, 1/95 and 2/95.		✓
92.	Mike Brashear (TWC) letter 7/12/93 to Art Fokakis re: inspection of facility on 7/2/93.		✓
93.	TWC Interoffice Memo dated 7/12/93 re: on-site inspection on 6/23 and 7/2/93.		✓
94.	TWC Inspection Cover Sheet for 6/23 and 7/2/93 inspection		✓
95.	Facility Record Review Checklist for TWC inspection.		✓
96.	TWC Facility Site Inspection Sheet for 6/23 and 7/2/93 inspection.		✓
97.	TWC Solid Waste Inspection Report/Permit Compliance Checklist (no date)		✓
98.	Various TWC Inspection Check Lists (presumably for 6/23 & 7/2/93 inspection)		✓
99.	Map No. 1 - Permitted Unit No. 2; Map No. 2 - Swale and Sump., Map No. 3 - Old Processing Pad		✓
100.	Black & white photos taken at facility by TWC		✓
101.	Attachment 5 - 1/4/91, 8/10/92, 10/9/92 and 7/14/93 letters to TWC from Gibraltar giving a Notice of Noncompliance at the facility.		✓
102.	Attachment 4-manifest and supporting documents for 9/93 incident.		✓
103.	Attachment 8-GM Waste profile dated 9/7/93.		✓
104.	TNRCC Interoffice Memo dated 9/21/93 re: investigation of reaction of T-230 on 9/13-16/93.		✓
105.	Various handwritten notes, lab data reports, and spill reporting forms		✓
106.	TACB violation form dated 6/22/95.		✓
107.	TACB violation form dated 6/8/95.		✓
108.	Letter 5/12/95 re Notice of Trigger Level Exceedance, May 9, 1995		✓
109.	Email 1/9/93 re meeting with Sue Sung of Trinity Consultants.		✓



*General Motors Corporation v American Ecology Environmental Services Corp., et al*

Case No 3.99-CV-2625-L

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TRIAL EXHIBIT LIST**

<b>Exhibit Number</b>	<b>Description</b>	<b>"Expect" to offer</b>	<b>"May" offer if need arises</b>
110.	Letter 06/14/93 to TWC re spill report		√
111.	Letter 9/23/93 to TNRCC re Release Report		√
112.	TNRCC memo re: Gibraltar Account No. SK-0057-E		√
113.	Solvent Recovery Daily Inventory dated 9/7/93 involving GM waste.		√
114.	Solvent Recovery Daily Inventory dated 9/8/93 involving GM waste.		√
115.	Solvent Recovery Daily Inventory dated 9/9/93 involving GM waste.		√
116.	Production sample dated 9/9/93 for waste from GM-Shreveport		√
117.	Still run dated 9/7/93 re: GM Shreveport waste.		√
118.	Chronology of Events involving incident with T-230 on 9/9/93.		√
119.	Memo dated 9/18/93 re: 9/9/93 incident.		√
120.	Trinity Consultants Memo with resources area map re: 9/9/93 incident.		√
121.	Letter 8/19/92 and handwritten notes to Camilleri from T. Grisham re: GM receiving report.		√
122.	Memo 9/26/89 from Tom Grisham to Distribution re Customer Waste Sent to Marine Shale		√
123.	Daily inventory reports which reference GM.		√
124.	SF Inbound Report that references GM..		√
125.	Memo 1/31/94 re contracts with restrictions concerning several companies including GM.		√
126.	Memo dated 1/8/93 re: release occurring at facility on 1/7/93 at approximately 2:00 pm.		√
127.	Conference record 5/6/92 re: TACB notice of violation for nuisance odor		√
128.	Safety inspection scores for deepwell		√
129.	Major Amendment Notes dated 10/25/90 pertaining to Solids Grinding Systems.		√
130.	Waste Master report involving General Motors waste.		√

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TRIAL EXHIBIT LIST**

<b>Exhibit Number</b>	<b>Description</b>	<b>"Expect" to offer</b>	<b>"May" offer if need arises</b>
131.	Memo 1/16/95 re approval changes involving General Motors waste.		✓
132.	Memo re customer handling requirements and restrictions with chart dated 10/27/94 showing customer restrictions.		✓
133.	Memo re customer handling requirements and restrictions with chart dated 10/11/94 showing customer restrictions.		✓
134.	Miscellaneous analysis logs, production samples and transportation tickets that reference General Motors as the Generator.		✓
* 135.	General Release (First Group of Settling Defendants) - <i>Virgie Adams, et al v. Acadia Elastomers Corp., et al, District Court, 236<sup>th</sup> District Court, Tarrant County, Texas</i>		✓
136.	Letter 5/13/99 from Hilliard to Sniff re settlement negotiations	✓	
137.	Letter 6/7/99 from Hilliard to Sniff re settlement demand	✓	
138.	Letter 6/15/99 from Hilliard to Sniff re settlement demand	✓	
139.	Letter 8/2/99 from Kisner to Quinlan re settlement		✓
140.	Letter 8/10/99 from Sniff to generator defendants' counsel re settlement		✓
141.	Letter 8/13/99 from Sniff to Mobley and AEC re settlement		✓
142.	Environmental Resource Management's Commercial hazardous Waste Facility Evaluation on Gibraltar.		✓
143.	GM's Plant Environment/Environmental Activities Staff's Transporter and Waste Management Facility.		✓
144.	Argonaut AEC Waste Management Services/GMC Hazardous Waste Management Facility Summary on Gibraltar.		✓
145.	Argonaut AEC Waste Management Services/GMC Hazardous Waste Management Facility Summary on Gibraltar.		✓
146.	Argonaut AEC Waste Management Services/GMC Hazardous Waste Management Facility Summary on Gibraltar.		✓
147.	Plant Environment Environmental Activities Staff/General Motors Corporation's Transporter and Waste Management Facility Evaluation of Gibraltar.		✓

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<b>Exhibit Number</b>	<b>Description</b>	<b>"Expect" to offer</b>	<b>"May" offer if need arises</b>
148.	ENSR information re: audit performed on behalf of WSIG.		✓
149.	Gibraltar Facility Audit Information.		✓
150.	Radian Corporations Audit Report titled <i>Hazardous Waste Facility Audit &amp; Risk Assessment Volume I</i> dated 11/18/93.		✓
151.	Radian Corporation's audit report of Gibraltar titled <i>Hazardous Waste Facility Audit &amp; Risk Assessment Volume II Audit Checklist &amp; Supporting Documentation</i> (11/18/93).		✓
152.	ENSR's Hazardous Waste Facility Audit of Gibraltar - Vol. 1.		✓
153.	ENSR's Hazardous Waste Facility Audit of Gibraltar - Vol. 2.		✓
154.	Plaintiffs Medical data chart from <i>Adams</i> litigation.		✓
155.	Correspondence dated April 5, 1994 to Mr. Steve Mason of Contingency Planning Section (6E-EP) regarding Response to Information Pursuant to Section 104 of CERCLA with attachments 1-6.		✓
156.	Violation Review; List of Violations against AEC, Compliance History/Summaries.		✓
157.	Fax coversheet to Kirk Sniff from Robert C. Hilliard with an attached revised page 6 of the Final Judgment.		✓
158.	Facsimile dated November 4, 1999 to Delwin Hervey from Ashley T. Kisner re: response to John Quinlan's letter of November 1, 1999.		✓
159.	November 30, 1993 handwritten thank you note to Chuck Wyrick from facility re: his visit to Gibraltar and the housekeeping issues he raised.		✓
160.	Correspondence to Rosemary Sage Jones from Kirk Sniff dated April 8, 1999 re: obtaining copies of insurance certificates and policies.		✓
161.	Correspondence to Art Noel from Zurich dated July 20, 1999.		✓
162.	Correspondence to Art Noel from Zurich dated September 29, 1999 re: letter of 9/3/99 requesting them to reconsider their position.		✓
163.	Correspondence to Rosemary Sage Jones from Karen Willcutts dated April 24, 2000 enclosing Plea in Intervention and demanding indemnity.		✓
164.	Correspondence dated August 15, 1997 to Charles E. Brown regarding enclosing a "Settlement Authority"		✓

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TRIAL EXHIBIT LIST**

<b>Exhibit Number</b>	<b>Description</b>	<b>"Expect" to offer</b>	<b>"May" offer if need arises</b>
165.	Memorandum/status report to Charlie Brown from Steven L. Dickerson dated November 24, 1998. [Redacted version]		✓
166.	Correspondence dated December 7, 1998 to Charles Brown from Steven Dickerson informing that Bob Hilliard would be available on the 10 <sup>th</sup> and 11 <sup>th</sup> should they wish to discuss settlement negotiations.		✓
167.	Correspondence dated June 16, 1999 to Art Noel from Kirk Sniff enclosing a Rule 11 Agreement evidencing Texaco's settlement in the <i>Adams</i> case and also enclosing a letter from Bob Hilliard reminding of his settlement deadline.		✓
168.	Fax coversheet with an attached correspondence dated July 22, 1999 to Art Noel from Kirk Sniff regarding status of settlement negotiations between GM and the plaintiffs.		✓
169.	Invoices of Davis Ford services provided from June 30, 2000 through October 31, 2000. (Produced at Davis Ford Deposition)		✓
170.	Gibraltar Chemical Resources Spill Reporting Form dated 10/10/93.		✓
171.	Gibraltar Chemical Resources Spill Reporting Form dated 10/25/93		✓
172.	Gibraltar Chemical Resources, Inc. Supervisor's Incident Investigation Report sent to Art Fokakis from Lynn Goldston. dated 09/16/93		✓
173.	Gibraltar Chemical Resources Spill Reporting Form dated 09/15/93		✓
174.	Handwritten notes received from John Boles on 06/23/93, e-mail message from Lynn Goldston dated 06/18/93 to Art Fokakis re: T-127 problem of 06/14/93, e-mail message from Bob Mann to Art Fokakis regarding T-102, T-127 Fumes, e-mail message from Ed Conley to Art Fokakis dated 06/21/93 regarding Tanks 102 and 127, e-mail message from Ed Conley to Art Fokakis dated 06/22/93 regarding Tank 102 and 127.		✓
175.	Memorandum from Adrienne Crain to Bob Mann dated 06/15/93 regarding T-102 and T-127.		✓
176.	Article titled, "Blast at Gibraltar Tanks Quickly Handled, Firm Says", Investigation Summary dated 07/10/92, Investigation/Violation Form dated 07/14/92, Investigation summary with a stamped date of 07/30/92 and an area map.		✓
177.	Incident report regarding an incident dated 10/18/91.		✓
178.	Hazardous Waste Manifest #00131597. Generator: Truck & Bus Shreveport Plant.		✓

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<b>Exhibit Number</b>	<b>Description</b>	<b>"Expect" to offer</b>	<b>"May" offer if need arises</b>
179.	03/14/90 GCR Memo to Supervisors from James Waldron re: difficulty identifying origin waste drums.		√
180.	10/6/93 Memo to Tom Kurkky and Lynn Goldston from Kevin Bittner re GM Bi-Annual Report and problems with GM waste being sent to Rollins and USPCI, both unapproved GM outlets.	√	
181.	Gibraltar tracking sheet with deepwell sample analysis data attached involving waste from GM Mexico facility (DELMEX). HWCDF# 030590.		√
182.	Deepwell sample analysis data involving waste from GM Mexico facility (DELMEX). HWCDF# 030591.		√
183.	Hazardous Waste Manifest #00131597 dated 01/11/93.		√
184.	Uniform Hazardous Waste Manifest dated 10/5/96 - Generator: Delphi		√
185.	3/1/90 ltr. to Brian Bond (GM) from T. Grisham certifying that no GM waste has been deepwell injected.	√	
186.	S&P bills in GM v. AEC from October 2000 through April 2001.		√
187.	S&P bill in GM v. AEC dated 6/20/01 for time billed in May 2001.		√
188.	12/12/90 ltr. to Tom Grisham (GCR) from Larry Camiller re: certificate of insurance.		√
189.	12/20/90 ltr. to Tom Grisham (GCR) from Larry Camilleri re: deficiencies in certificate of insurance.		√
190.	9/25/90 ltr. to Tom Grisham (GCR) from Larry Camilleri re: pricing information and other proposals.		√
191.	Certificate of Insurance dated 09/11/95		√
192.	Letter dated 6/12/97 to Toni Graham (AEC) from Linda Kriss (Johnson & Higgins) re: additional insureds		√
193.	Memo, correspondence and documentation re: EPA Criminal Investigation involving GM (Delnosa) waste.		√

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<b>Exhibit Number</b>	<b>Description</b>	<b>"Expect" to offer</b>	<b>"May" offer if need arises</b>
194.	Letter dated 02/21/97 to Rob Trimble from Efren Ordonez (EPA) re: EPA investigation.		✓
195.	Reports of EPA Criminal Investigations at Gibraltar.		✓
196.	June 29, 1989 letter to Lou Lynch (Marsh & McLennan) from Betty Schnack enclosing changes requested by GM on insurance certificate.		✓
197.	July 27, 1989 cover letter to Marvin Asbury (GM) from Betty Schnack enclosing permits.		✓
198.	August 9, 1989 ltr. to T. Grisham from D.C. Mackey (GM) commenting on certificate of insurance.		✓
199.	October 4, 1989 ltr. to T. Grisham from L. Camilleri re: corporate purchase agreement.		✓
200.	December 18, 1989 Internal facility memorandum re: GM Process Completion Compliance Certificate w/ attached 10/17/89 memo w/ handwritten notes and sample form of certificate.		✓
201.	Fax cover to Lou Lynch from Betty Schnack transmitting April 3, 1990 ltr. to T. Grisham from L. Camilleri re: problems with current certificate of insurance as established in corporate purchase agreement #3837.		✓
202.	September 25, 1990 letter to T. Grisham from L. Camilleri re: pricing attachment and other proposals by facility.		✓
203.	October 11, 1990 letter to T. Grisham from L. Camilleri re: fuel surcharges.		✓
204.	December 12, 1990 letter to T. Grisham from L. Camilleri re: insurance certificate.		✓
205.	April 11, 1991 letter to L. Camilleri from T. Grisham re: off-site services.		✓
206.	April 15, 1991 letter to T. Grisham from L. Camilleri re: additional off-site facilities.		✓
207.	June 23, 1992 letter to M. Jackson (GM) from B. Schnack re: Certificate of Insurance.		✓
208.	March 26, 1993 letter to M. Jackson (GM) from B. Schnack enclosing certificate of insurance.		✓
209.	General Motors Sales History Summary as of 5/31/93 w/ attached pricing attachments.		✓

**PLAINTIFF GENERAL MOTORS CORPORATION'S  
TRIAL EXHIBIT LIST**

<b>Exhibit Number</b>	<b>Description</b>	<b>"Expect" to offer</b>	<b>"May" offer if need arises</b>
210.	September 2, 1993 letter to L. Camilleri from K. Bittner re: adding outlet Rollins and USPCI to approved list.		✓
211.	September 9, 1993 letter to K. Bittner from L. Camilleri stating that GM will not allow Rollins to be added to approved list of outside vendors.		✓
212.	7/25/96 letter to Camilleri from Marchand requesting permission to amend Corporate Purchase Agreement to add various vendors to the approved outlet list.		✓
213.	8/16/96 letter to Marchand from Camilleri agreeing to add all vendors to approved list except Rollins.		✓
214.	Mitcheal D. Wilson deposition Vol. I (Tangee/Akzo/Steich v. GCR/Williams) 09/26/96		✓
215.	Mitcheal D. Wilson deposition Vol. II (Tangee/Akzo/Steich v. GCR/Williams) 09/27/96		✓
216.	Mitcheal D. Wilson deposition Vol. III (Steich v. AEESC/GCR) 10/14/97		✓
217.	Mitcheal D. Wilson deposition (Erwin v. GCR/Mobley) 02/07/94		✓
218.	Mitcheal D. Wilson deposition (Adams v. AEESC/GCR/Motheral) 09/11/98		✓
219.	GCR, Inc. Alleged violation of Environmental Regulation at permitted TSDF (January 1, 1989 through August 25, 1994)		✓
220.	4/5/94 response to Information pursuant to Section 104 of CERCLA. Prepared by Mitch Wilson. Aarea map attached.		✓
221.	Condensed miniscript deposition of Michelle McFaddin Atwell 9/20/99 and evidentiary exhibits		✓
222.	10/27/93 Report from Jones and Neuse, Inc. (attached also to Radian Report)		✓
223.	6/15/93 Letter to Camilleri from Grisham re: extending environmental services to the GM facilities in Mexico.		✓
224.	February 12, 1993 Letter to Customers from Kitto & Grisham re: recent WFAA TV series on Gibraltar.		✓
225.	March 1993 Handwritten notes and memos re Operation Chemical Storm and picketing at GM Arlington plant.		✓

**PLAINTIFF GENERAL MOTORS CORPORATION'S  
TRIAL EXHIBIT LIST**

<b>Exhibit Number</b>	<b>Description</b>	<b>"Expect" to offer</b>	<b>"May" offer if need arises</b>
226.	Map showing that most toxic waste shipped into Gibraltar comes from out of state and Mexico.		√
227.	Skeleton drawing - A Whole New Meaning to "Talking Trash."		√
228.	June 29, 1999 Report of Colin J. Baynes, Ph.D. in the <i>Adams</i> litigation.		√
229.	June 30, 1999 Report of Leo Weitzman, Ph.D. in the <i>Adams</i> litigation.		√
230.	July 2, 1999 Report of William Sawyer, PhD in the <i>Adams</i> litigation.		√
231.	June 29, 1999 draft report of William Sawyer, PhD with attached CV.		√
232.	Handwritten notes of deposition of Rowland Foster and Art Noel and telephone conference with Tracy Crawford. Typed notes of telephone conference with Rosemary Jones, Brian Craft and Walter Conrad.		√
233.	July 3, 2001 supplemental report prepared by Rowland Foster.	√	
234.	Gibraltar Chemical Resources, Inc. Compliance with Laws - "Alleged violations of Environmental Regulations at permitted TSDF" January 1, 1989 through August 25, 1994. Written by Mitch Wilson.		√
235.	Master List of GCR Regulatory Issues (58 page chart).		√
236.	General Characterization Data and Approvals of Generator: Fisher Guide Div. Indicates that 40% routed to Deepwell		√
237.	GCR Tracking Procedure Sheet dated 09/16/88 re: Waste from Fisher Guide Div. of GM.		√
238.	AEC's Minutes to Board of Directors Meeting on 05/10/94.		√
239.	AEC's Minutes to Board of Directors Meeting on 05/26/94.		√
240.	October 31, 1989 letter to Charles Munson (attorney) from RR Commission of TX requesting documents needed to continue investigation of Gibraltar facility in Winona, TX.		√
241.	October 17, 1989 memo from Grisham re: requirement to complete Process Completion Compliance Certificate for all GM waste.		√
242.	AEC's Minutes to Board of Directors Meeting on 07/19/96.		√
243.	Affidavit of Robert C. Hilliard dated February 26, 2001.		√



*General Motors Corporation v. American Ecology Environmental Services Corp., et al.*

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**PLAINTIFF GENERAL MOTORS CORPORATION'S  
TRIAL EXHIBIT LIST**

<b>Exhibit Number</b>	<b>Description</b>	<b>"Expect" to offer</b>	<b>"May" offer if need arises</b>
244.	June 28, 1988 letter to Grisham from Clay Martin giving GM's decision not to add Gibraltar as a hazardous waste contractor due to their use of the "deepwell injection" method.		√
245.	9/9/93 Incident Report from Jack Robinson re: incident with Tank 230 which contained waste from GM-Shreveport.		√
246.	Gibraltar Tracking Procedure dated June 7, 1991 related to waste from Packard Electric. Indicates that waste will be deepwell injected.		√
	Additional S&P attorney fees invoices that will be generated in current litigation.		√